

IN THE DISTRICT COURT OF OKLAHOMA COUNTY  
STATE OF OKLAHOMA

FILED IN DISTRICT COURT  
OKLAHOMA COUNTY

OCT 31 2022  
RICK WARREN  
COURT CLERK

Oklahoma Department of Securities )  
*ex rel.* Melanie Hall, Administrator, )

Plaintiff, )

v. )

Premier Global Corporation, a Kansas corporation, )  
formerly known as Premier Construction Services, )  
Inc., and doing business as Premier Construction )  
Billing; )

Premier Factoring, LLC, a Kansas limited )  
liability company; )

PF-2, LLC, a Kansas limited liability company; )

PF-3, LLC, a Kansas limited liability company; )

PF-4, LLC, a Kansas limited liability company; )

PF-5, LLC, a Kansas limited liability company; )

PF-6, LLC, a Kansas limited liability company; )

PF-7, LLC, a Kansas limited liability company; )

DDI Advisory Group, LLC, a Kansas limited )  
liability company; )

Steve Jonathan Parish, an individual; )

Richard Dale Dean, an individual; )

Premier Marketing Management, )  
a Kansas corporation; )

Joshua Dane Owen, an individual; )

J&H Holdings, LLC, a cancelled Oklahoma )  
limited liability company; )

Kyle Blackburn, an individual; )

Mitzimack, Inc., an Oklahoma corporation; )

Erika Greggs, an individual; )

Elkins & Associates Inc., an Oklahoma corporation; )

Clyde Edward Elkins, an individual; )

James Scott Stanley, an individual; )

Edmond Brokerage, Inc., an Oklahoma corporation; )

Brent Lee Worley, an individual; )

Byron Kent Freeman, an individual; )

Karen Lynne Freeman, an individual; and )

Jay Michael Bogdahn, an individual, )

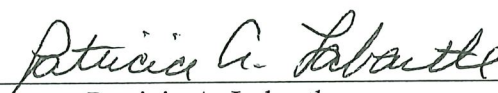
Defendants. )

Case No. CJ-2022-5066

VERIFIED STATEMENT REGARDING REPRESENTATION OF COUNSEL

The Oklahoma Department of Securities ("Department"), *ex rel.* Melanie Hall, Administrator, respectfully submits to the Oklahoma County District Court this verified statement of Patricia A. Labarthe, an attorney for the Department, in support of its application for an emergency order appointing a receiver pursuant to the Oklahoma Uniform Securities Act of 2004 ("Act"), Okla. Stat. tit. 71, §§ 1-101 through 1-701 (2022). The Department is not aware of the representation of counsel in this matter for any Receivership Defendant, as defined in the application. Jeanette Timmons, of Connor & Winters, LLP, represents Defendants J&H Holdings, LLC; Kyle Blackburn; Mitzimack, Inc; Erika Greggs; James Scott Stanley; Edmond Brokerage, Inc.; Brent Lee Worley; Byron Kent Freeman; and Karen Lynne Freeman, who are not Receivership Defendants, and has no objection to the appointment of a receiver. Justin Williams, of Overman Legal Group, represents Defendants Premier Marketing Management and Joshua Dane Owen, who are not Receivership Defendants, and has no objection to the appointment of a receiver. The Department is not aware that any other Defendant is represented by counsel.

Further Affiant sayeth not.

  
Patricia A. Labarthe

Subscribed and sworn to before me this 31<sup>st</sup> day of October, 2022.



  
Notary Public

My Commission Expires: 09/19/2025